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Hearing Date and Time: July 19, 2007 at 10:00 a.m.
Response Date and Time: July 12, 2007 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

Jointly Administered

RESPONSE OF MOTION INDUSTRIES, INC. TO DEBTORS' SIXTEENTH
OMNIBUS OBJECTION (PROCEDURAL) PURSUANT TO 11 U.S.C. §502(B) AND
FED. R. BANKR. P. 3007 TO CERTAIN (A) DUPLICATE OR AMENDED CLAIMS,
AND (B) PROTECTIVE CLAIMS (the "SIXTEENTH OMNIBUS CLAIMS OBJECTION")

Motion Industries, Inc. ("Motion"), by and through its undersigned attorneys, for its
Response to Debtors' Sixteenth Omnibus Claims Objection (the "Response") respectfully states
as follows:

1. On October 8 and 14, 2005 (the "Petition Date(s)"), Delphi Corporation and
certain of its subsidiaries and affiliates (the "Debtors") filed voluntary petitions for relief under
Chapter 11 of the title 11 of the United States Code (the "Bankruptcy Code"). The Debtors
continue to operate their businesses and manage their properties as debtors-in-possession under
Sections 1107(a) and 1108 of the Bankruptcy Code. The Court has ordered joint
administration of these cases.

2. On April 12, 2006, this Court entered an order establishing July 31, 2006 (the
"Bar Date") as the last date for entities to file proofs of claim against the Debtor(s).

3. On July 21, 2006, Motion filed proof of claim No. 10251 in the amount of \$835,355.82 (the "Claim") in the Delphi Automotive Systems LLC ("Delphi Automotive") case. The amounts sought in the Claim were for amounts owed to Motion by Delphi Automotive for maintenance, repair and operation replacement parts (the "MRO Parts") sold by Motion to Delphi Automotive and for which Motion has not received payment. Examples of such MRO Parts include belts, motors, hoses, lubricants, springs, nozzles, valves and chains.

4. On June 15, 2007, the Debtors filed the Sixteenth Omnibus Claims Objection, wherein they objected to the Claim as duplicate or amended. The Debtors and Motion have tentatively settled their differences related to the Claim which they have memorialized in a draft Settlement Agreement and Joint Stipulation and Agreed Order Compromising and Allowing the Claim and other claims filed by Motion which are addressed in the Seventeenth Omnibus Claims Objection (the "Joint Stipulation"). The parties contemplate that once the Joint Stipulation is entered by the Bankruptcy Court, Motion will withdraw this Response. Until that time however, Motion wants to protect its interests in connection with the Sixteenth Omnibus Claims Objection.

CONCLUSION

5. For the reasons set forth above, Motion respectfully requests that the Court adjourn the hearing on the Claim until the parties are able to consummate the settlement referenced above. Motion further request such other and further relief as the Court deems equitable.

Respectfully Submitted,

Dated: July 11, 2007

/s/ William J. Barrett

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